

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

2022 NOV -8 PM 4: 17

Mark Saunders,

Plaintiff,

v.

Rosalind Picard, Ann MacKay,

Kristen Luken, Roger Mark,

Thomas DuVol, Harold Jones,

Garrett Smith, Daniel Romaine,

Anders Brownworth, Carmen Aldinger,

Doris Kellom, Beatrice Yankey and the

Newton Covenant Church

Defendants.

U.S. DISTRICT COURT
DISTRICT OF MASS.

Civil Action No. 1:21-cv-11240-AK

PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME FOR SERVICE

COMES NOW the Plaintiff, appearing pro se, moves for an enlargement of time to serve Defendants for the following reasons:

1. On October 31st, 2021, Plaintiff filed a renewed motion for leave to proceed in forma pauperis and an application to proceed without prepayment of fees and affidavit with supplemental documentation.
2. Plaintiff's renewed motion was granted by the COURT on April 12, 2022.
3. Plaintiff received an ORDER from the COURT directing him to serve Defendants within 90 days of the issuance of the summonses, with the option to have service performed by the U.S. Marshals Service (USMS). The summonses were issued on August 10, 2022.
4. Service on Defendants is currently due on November 8, 2022.

5. Plaintiff cannot afford counsel to aid in locating Defendants or to aid in preparing documentation for service by the USMS.
6. Plaintiff is legally disabled and currently under extreme physical duress due to a fall in December, 2021, resulting in a new spinal fracture, among other injuries. He is being treated at the Beth Israel Deaconess Medical Center, Shapiro Spine Center, by Dr. Anthony C. Lee. Plaintiff is scheduled for electromyography for neuropathy and a radiosopic epidural spinal injection to alleviate sciatica pain and neuropathy. Plaintiff has also been in physical therapy every week for several months, which is ongoing.
7. Plaintiff currently has no vehicle and the closest public transportation is over a half mile away. As such, he has been unable to seek medical treatment for over a month, further exasperating his condition.
8. As a pro se Complainant and due to his disabilities, Plaintiff is severely restricted by the inability to easily access and review legal information. As Plaintiff is not a member of the Bar and is not a law school student, he is denied access to libraries at local schools of law.
9. Plaintiff also has no access to the electronic filing system (CM/ECF) and must rely on travel and ambulation to file legal documentation. This is extremely difficult at the current time.
10. A considerable amount of time has been spent preparing these packages and in discussion with the clerk's office and performing online searches with regard locating Defendants' addresses and how to prepare the service packages. Plaintiff does not have access to Newton Covenant Church's database of congregant

addresses, nor access to professional search tools. This makes confirmation of Defendants' home addresses extremely difficult.

11. All service packages have now been delivered to the USMS.
12. I ask for this extension out of an abundance of caution, as I am unaware of the timeframe for service by the USMS, and believe that as such, it is a reasonable request.
13. As Defendants have not been served or otherwise been informed of this action, there will be no prejudice.

WHEREFORE, Plaintiff respectfully requests that an additional sixty (60) days in which to serve Defendants.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark Saunders', is written over a horizontal line.

Mark Saunders
28 Cushman Street
Watertown, Massachusetts 02472-3704
617-905-7454

DATE: 11-8-22